

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Broadcast Music, Inc., et al.
Plaintiffs

No. 13-cv-2480 (JRT/LIB)

v.

R. Von, Inc., et al.,
Defendants.

DEFENDANTS' MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT

To: The Court:

Defendants R. Von, Inc. and Richard Vonderhaar respectfully move the Court for an extension of time to answer the complaint in this matter.

As good cause for this extension, defendants state:

1. Counsel for plaintiffs (William Schultz) has by email advised counsel for defendants that:

In the meantime, I see that the response is due today. Based on the continued good faith settlement discussion, we will consent to an additional extension of time of 3 weeks to file a response.

2. The parties' continuing discussions in this matter may resolve the matter without need for action from this Court. Accordingly, extending the time would conserve judicial resources that would otherwise be expended.

3. One previous extension of time has been requested.

4. According to a PACER search conducted November 15, 2013, no hearings have been scheduled in this matter.

WHEREFORE, defendants pray that the Court extend the time for defendants to answer or otherwise respond to plaintiff's complaint for three weeks, which would be an

extension to December 6, 2013.

Respectfully submitted,

dated: November 15, 2013

/e/ Sam Calvert

Sam V. Calvert, atty id #1431X

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